

March 6, 2017

Marlene H. Dortch Secretary Federal Communications Commission 445 12th Street, S.W. Washington, D.C. 20554

Re: Notice of Ex Parte Communication, MB Docket Nos. 14-50, 09-182, 07-294,

04-256; GN Docket No. 16-142

Dear Ms. Dortch:

On March 2, 2017, a group of radio and television station owners and managers from markets of various sizes across the country and state broadcast association representatives¹ met with Michelle Carey, Mary Beth Murphy, Brendan Holland, and Brendan Murray of the Media Bureau.

During the meeting, station representatives discussed the importance of updating the Commission's broadcast ownership rules to permit broadcasters to realize economies of scale. They explained that rule modifications are critical to their ability to effectively compete with other outlets for viewers, listeners and advertising dollars. Station representatives provided examples of sharing arrangements and combinations permitted under the rules (or by waiver) that have allowed them to offer unique public services they would otherwise have been unable to provide, including one small town's first local news operation in a decade, emergency weather translated into Spanish, and monthly town halls. One broadcaster discussed how a grandfathered newspaper-broadcast combination allows each medium to focus on its area of greatest expertise—a newspaper that is a leader in enterprise journalism; a television station focusing on investigative journalism and weather; and the radio station emphasizing breaking news and traffic. Others discussed the rise of competition for advertising dollars from outlets that face no ownership restrictions, including Google, Facebook, and cable interconnects. The broadcasters stated that ownership rule

¹ A list of participants is attached hereto.

changes would allow them to create efficient combinations in more markets, permitting them to expand and enhance their service to more consumers.

Broadcaster representatives also expressed their gratitude for the FCC's recent action on next generation television and stated that they look forward to being able to offer the best in quality picture and sound to their viewers.

Respectfully submitted,

Erin L. Dozier

Senior Vice President and Deputy General Counsel

Legal and Regulatory Affairs

cc: Michelle Carey, Mary Beth Murphy, Brendan Holland, Brendan Murray

Broadcasters in Attendance		
Klarn DePalma	Meredith	Cheshire, CT
Michael Ryan	Connecticut Broadcasters Association	Avon, CT
Brad Streit	Raycom Media	Montgomery, AL
Tracey Rogers	Raycom Media, WMC-TV	Memphis, TN
Polly Prince Johnson	Louisiana Association of Broadcasters	Baton Rouge, LA
Evan Pappas	KOAA-TV	Colorado Springs, CO
Mike Pumo	Sinclair Broadcasting – West Palm Beach	West Palm Beach, FL
Jon Saunders	Cordillera Communications	Bozeman, MT
Dennis Lyle	Illinois Broadcasters Association	Springfield, IL
Doug Levy	Univision Media	Chicago, IL
Richard Jones	ABC 4	Salt Lake City, UT
Dale Zabriskie	Utah Broadcasters Association	Salt Lake City, UT
Michele Zabriskie	Utah Broadcasters Association	Salt Lake City, UT
Jay Huizenga	KELO-TV	Sioux Falls, SD
Wes Milbourn	Tribune Broadcasting KFOR/KAUT TV	Oklahoma City, OK
Vance Harrison	Oklahoma Association of Broadcasters	Oklahoma City, OK
Susan Ramsett	Gray Television	Lincoln, NE
Jim Timm	Nebraska Broadcasters Association	Omaha, NE
Tim Walker	WTOK-TV	Meridian, MS
David Donovan	New York State Broadcasters Association	Albany, NY
Robert Krummenacker	WBNG-TV Binghamton	Binghamton, NY
Steve Rabb	Tribune Broadcasting (FOX)	Hartford, CT
Carl Gardner	Bonneville Seattle Media Group	Seattle, WA
Charles Marshall	Brooks Pierce	Raleigh, NC
Monte Loos	KOTA-TV	Rapid City, SD
Joe Berry	California Broadcasters Association	Sacramento, CA
Bob Houghton	Georgia Association of Broadcasters	Atlanta, GA
Shuneca Harrington	WRBL-TV	Columbus, GA
Ed Levine	Galaxy Communications	Syracuse, NY
Dave Arland	Indiana Broadcasters Association	Carmel, IN
Christine Merritt	Ohio Association of Broadcasters	Columbus, OH
Ben Downs	Bryan Broadcasting	College Station, TX
Bobby Taylor	New Jersey Broadcasters Association	Monroe Township, NJ

National Association of Broadcasters
Erin Dozier
Emmy Parsons